

DECLARATION OF LEROI O'BRIEN

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2 1. I am a Police Officer with the Los Angeles Police
3 Department ("LAPD"), and I have been so employed since May 1998.
4 I am currently a patrol officer for the Central Division. From
5 April 2009 to April 2011, I was assigned to the Central Area Vice
6 Unit as a Vice Investigator.

7 2. During my employment with LAPD, I have investigated
8 hundreds of crimes. I have conducted numerous crime scene
9 investigations and interviewed witnesses and suspects involved in
10 a variety of crimes. I have also been involved with numerous
11 search warrants concerning various crimes. During my time as a
12 Vice Investigator, I completed LAPD's 40-hour vice school, and I
13 was a part of over 100 arrests of individuals for lewd acts and
14 prostitution.

15 3. The following information concerns LAPD's investigation
16 of the 907 Club, the search warrant executed against the club,
17 the arrest of 77 female employees, and the seizure of evidence
18 from the Club. All of the following is based upon what I
19 personally witnessed or upon information provided to me by other
20 LAPD officers.

21 4. On June 25, 2010, three LAPD officers conducted an
22 investigation to determine whether the 907 Club was operating in
23 compliance with its Conditional Use Permit. At that time, the
24 officers discovered seven female employees who did not possess
25 valid State of California identification cards or drivers
26 licenses. Employing individuals without valid identification was
27 a violation of the club's Conditional Use Permit, condition
28 numbers 12 and 14.

1 5. The LAPD officers then spoke with the club's
2 management, who provided copies of identification cards for
3 various employees. These cards were not valid, because every
4 number on the copies of the cards presented did not belong to the
5 person listed on each card or was an invalid ID number.

6 6. On July 22, 2010, two undercover LAPD officers entered
7 the 907 Club and encountered a female employee, who told the
8 officers that lewd acts and prostitution occurred at the club.
9 The employee also stated that these acts cost more than the
10 normal hostess rate. Acts of prostitution were in violation of
11 the club's Conditional Use Permit, conditions 14 and 15, and in
12 violation of California state law.

13 7. On July 30, 2010, the same two undercover LAPD officers
14 again entered the 907 Club, when the club was advertising the
15 "Bikini Girls Show." Inside a male restroom, one officer found
16 used condoms on the floor. The officers also observed two seated
17 males receiving lap dances during the "Bikini Girls Show." The
18 two men were allowed to digitally penetrate the dancer's vaginas.
19 After the club's security staff collected money from these two
20 men, two other men were allowed to digitally penetrate the women.

21 8. On July 30, 2010, one undercover officer observed male
22 customers playing pool for money. The officer then played in a
23 subsequent game and lost \$20. This activity occurred within
24 sight of the club's staff. This activity was also in violation
25 of the club's Conditional Use Permit, condition number 14. On
26 August 11, 2010, four undercover officers observed male customers
27 gamble at the pool table, and one officer played a pool game for
28 money. This activity also occurred within sight of the club's

1 staff. Undercover officers again witnessed illegal gambling at
2 the pool tables within sight of the club's staff on August 20,
3 2010, and August 25, 2010.

4 9. On November 2, 2010, LAPD officers spoke with a
5 Confidential Informant ("CI"). The CI stated that she was hired
6 at the 907 Club and provided false identification upon a
7 manager's request. While working at the club, the CI observed
8 the "Bikini Girls Show." During the show, female dancers exposed
9 their breasts and allowed male customers to digitally penetrate
10 their vaginas. The club's security staff collected money from
11 the men and gave it to the cashier.

12 10. Based upon all the foregoing, I filed an application
13 for a search warrant. On November 2, 2010, a Superior Court
14 judge issued the warrant based upon a finding of probable cause.

15 11. On November 5, 2010, LAPD officers, including myself,
16 executed the search warrant against the 907 Club. Upon entry
17 into the club, officers observed four female dancers wearing
18 bikinis, and they were providing lap dances. This adult
19 entertainment was in violation of the club's Conditional Use
20 Permit, condition number 13. The security guards collected money
21 from the patrons who received the lap dances, and defendant
22 BAQUIAX managed the bikini show.

23 12. After the location was secured, LAPD officers began to
24 check the female employees for valid identification. The
25 officers also checked the employee applications on file for each
26 employee, which contained photocopies of the identification
27 documents used to secure employment. Out of approximately 85
28 female employees working at the 907 Club that evening, LAPD

1 determined that 19 women used false identification documents to
2 obtain employment. LAPD also discovered that another 58 female
3 employees possessed false identification cards, which were stored
4 in their lockers. These 77 women were arrested and booked into
5 LAPD custody.

6 13. LAPD seized and booked into evidence all the fraudulent
7 identification cards, which included California identification
8 cards, resident alien cards, social security cards, and Mexican
9 identification cards.

10 14. At the same time as the female employees were
11 interviewed, LAPD officers also found and seized numerous
12 business records that were located in two offices of the 907
13 Club. These records included employment applications for female
14 employees, payroll records, time cards, daily sales sheets, and
15 bank records. LAPD also seized a computer that was located in
16 one of the offices.

17 15. LAPD officers did not seize all the documents located
18 in the two offices of the 907 Club. LAPD officer took about 75%
19 of the documents, which concerned employment of the female
20 hostesses and income generated for the 907 Club.

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1 16. On February 15, 2011, I attended a hearing before the
2 Superior Court. Subsequent to the hearing, the Superior Court
3 judge ordered LAPD to release the 907 Club's documents to ICE.
4 After this hearing, I personally authorized LAPD's Property
5 Division to turn over the documents to ICE Special Agent Craig
6 Porter.

7 I hereby certify under penalty of perjury that the foregoing
8 is true and correct to the best of my knowledge and belief.

9
10 Dated: September 20, 2011



LeRoi O'Brien